

EXHIBIT 2

RE: [EXTERNAL] Incognito - Preservation Letter / tolling Agreement

Reddy, Aarti <areddy@cooley.com>

Fri 6/28/2024 2:30 PM

To: Barry Walker <BarryW@potterhandy.com>; Claire Cylkowski <clairec@potterhandy.com>; Mark Potter <mark@potterhandy.com>

Cc: Porter, Sara Victoria (Pitt) <sporter@cooley.com>; Somvichian, Whitty <wsomvichian@cooley.com>

[CAUTION EXTERNAL EMAIL: Keep PH safe. Think before you click!]

Barry –

Following up on your voicemail from earlier today, we cannot share the tolling agreement because it is designated confidential in the *Brown* action.

Thank you,

Aarti

Aarti Reddy

Cooley LLP

+1 415 693 2103 office

From: Barry Walker <BarryW@potterhandy.com>**Sent:** Friday, June 21, 2024 2:17 PM**To:** Reddy, Aarti <areddy@cooley.com>; Claire Cylkowski <clairec@potterhandy.com>; Mark Potter <mark@potterhandy.com>**Cc:** Porter, Sara Victoria (Pitt) <sporter@cooley.com>; Somvichian, Whitty <wsomvichian@cooley.com>**Subject:** Re: [EXTERNAL] Incognito - Preservation Letter / tolling Agreement**[External]**

Aarti,

Thank you for your response.

Our request is on behalf of current, absent class members now seeking damages. The contract is highly probative of the statute of limitations and doctrine of equitable estoppel and the failure to produce it will prejudice their efforts to obtain the damages recovery now sought.

Thanks,

Barry

From: Reddy, Aarti <areddy@cooley.com>

Sent: Friday, June 21, 2024 9:25 AM

To: Barry Walker <BarryW@potterhandy.com>; Claire Cylkowski <clairec@potterhandy.com>; Mark Potter <mark@potterhandy.com>

Cc: Porter, Sara Victoria (Pitt) <sporter@cooley.com>; Somvichian, Whitty <wsomvichian@cooley.com>

Subject: RE: [EXTERNAL] Incognito - Preservation Letter / tolling Agreement

[CAUTION EXTERNAL EMAIL: Keep PH safe. Think before you click!]

Barry – we are in receipt of the request. Can you please explain why you need a copy of the agreement?

Thanks,

Aarti

Aarti Reddy

Cooley LLP

+1 415 693 2103 office

From: Barry Walker <BarryW@potterhandy.com>

Sent: Tuesday, June 18, 2024 9:23 AM

To: Reddy, Aarti <areddy@cooley.com>; Claire Cylkowski <clairec@potterhandy.com>; Mark Potter <mark@potterhandy.com>

Cc: Porter, Sara Victoria (Pitt) <sporter@cooley.com>; Somvichian, Whitty <wsomvichian@cooley.com>

Subject: Re: Incognito - Preservation Letter / tolling Agreement

[External]

Good morning Aarti,

I'm following up on my previous email requesting a copy of the tolling agreement in *Brown v. Google*. If you are not the person I should speak with regarding that agreement, can you please direct me to the person I should contact?

Also, attached is a copy of our letter requiring your client to preserve evidence related to our clients' claims.

Thank you in advance for your professional courtesy and I look forward to hearing from you.

Best,

Barry

From: Barry Walker <BarryW@potterhandy.com>
Sent: Thursday, June 13, 2024 2:12 PM
To: Reddy, Aarti <areddy@cooley.com>
Cc: Porter, Sara Victoria (Pitt) <sporter@cooley.com>; Somvichian, Whitty <wsomvichian@cooley.com>
Subject: Re: Incognito - Global Stay Order

Hi Aarti,

Did you receive my recent email regarding the *Brown v. Google* tolling agreement?

Barry

From: Barry Walker <BarryW@potterhandy.com>
Sent: Monday, June 10, 2024 1:51 PM
To: Reddy, Aarti <areddy@cooley.com>
Cc: Porter, Sara Victoria (Pitt) <sporter@cooley.com>; Somvichian, Whitty <wsomvichian@cooley.com>
Subject: Re: Incognito - Global Stay Order

Aarti,

Do you have a copy of the tolling agreement between your client and certain class members regarding damages claims and can you provide it to us?

Barry

From: Reddy, Aarti <areddy@cooley.com>

Sent: Thursday, June 6, 2024 8:37 PM

To: Barry Walker <BarryW@potterhandy.com>

Cc: Porter, Sara Victoria (Pitt) <sporter@cooley.com>; Somvichian, Whitty <wsomvichian@cooley.com>

Subject: Incognito - Global Stay Order

[CAUTION EXTERNAL EMAIL: Keep PH safe. Think before you click!]

Barry,

Nice speaking with you today. Enclosed please find the global stay order and the note from the clerk confirming your complaint is covered by that order. That complaint is listed in the stay order on p. 86 under a different Plaintiff (Salcido).

Thanks,

Aarti

Aarti Reddy

Cooley LLP

3 Embarcadero Center, 20th Floor

San Francisco, CA 94111-4004

+1 415 693 2103 office

+1 415 693 2222 fax

+1 248 765 4415 mobile

areddy@cooley.com

www.cooley.com/litigation

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